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February 19, 2009

VIA ECFS

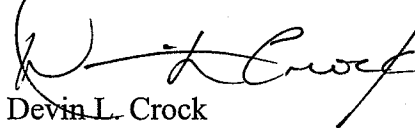
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Annual Customer Proprietary Network Information Compliance
Certification; EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), International Telecom, Ltd. hereby provides its Annual Customer Proprietary Network Information Compliance Certification. Please feel free to contact me if you have any questions regarding this filing.

Sincerely,



Devin L. Crock

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification: International Telecom, Ltd.

Form 499 Filer ID: 811580

Name of signatory: Yvette Melendez

Title of signatory: President

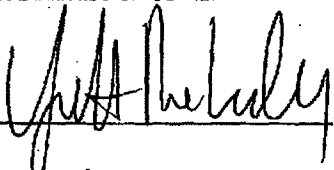
I, Yvette Melendez, certify that I am an officer of International Telecom, Ltd. ("ITL"), and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Apart from the information filed by other companies in Commission Docket No. 96-115, the company is not aware of information regarding the processes pretexters are using to attempt to access CPNI, and what steps other companies are taking to protect CPNI. The steps the company is taking to protect CPNI are explained in the accompanying statement.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



Date

Feb. 27, 2009

**Customer Proprietary Network Information Certification
Attachment A**

This statement explains how the procedures of International Telecom, Ltd. ("ITL") ensure that the company is in compliance with the CPNI requirements set forth in the Commission's rules, 47 C.F.R. § 64.2001 *et seq.*

USE OF CPNI – SECTION 64.2005

- ITL does not use, disclose or permit access to CPNI for the purpose of marketing the products or services of itself or any third parties. As such, ITL does not solicit the approval of customers to use CPNI for marketing purposes.
- ITL does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.

APPROVAL REQUIRED FOR USE OF CPNI – SECTION 64.2007

- ITL does not use, disclose or permit access to CPNI for the purpose of marketing the products or services of itself, its affiliates or any third parties, or for any purpose that would require ITL to solicit customer approval before doing so. As such, ITL does not solicit the approval of customers for use of CPNI.
- If ITL subsequently chooses to take any action for which customer approval is required, the company will implement policies and practices for seeking opt-out or opt-in approval from its customers in accordance with sections 64.2001 *et seq.* of the Commission's rules, 47 C.F.R. § 64.2001 *et seq.*, and obtain approval from its customers pursuant to these policies and practices before taking such action.

NOTICE REQUIRED FOR USE OF CPNI – SECTION 64.2008

- ITL does not solicit the approval of customers for use of CPNI, because the company does not use, disclose or permit access to CPNI for any purpose that would require the company to solicit such approval.
- If ITL subsequently chooses to take any action for which the company must solicit the approval of its customers for the use CPNI, the company will provide notice to its customers pursuant to, and in accordance with, the requirements of section 65.2008 of the Commission's rules. 47 C.F.R. § 64.2008.

SAFEGUARDS REQUIRED FOR USE OF CPNI – SECTION 64.2009

- ITL does not solicit the approval of customers for use of CPNI, because the company does not use, disclose or permit access to CPNI for any purpose that would require the company to solicit such approval. If ITL subsequently chooses to take any action for

which the company must solicit the approval of its customers for the use CPNI, the company will implement a system by which the status of the customer's CPNI approval can be clearly established prior to the use of CPNI.

- ITL has trained its personnel as to when they are and are not authorized to use CPNI, and the company has an established, express disciplinary process that can result in disciplinary actions up to, and including, termination of employment.
- ITL does not use, disclose or permit access to CPNI for the purpose of marketing the products or services of itself or any third parties, or for any purpose that would require ITL to solicit customer approval before doing so. If ITL subsequently chooses to use, disclose or permit access to CPNI for the purpose of marketing the products or services of itself, its affiliates or any third parties, the company will maintain a record of (1) its own and its affiliates' sales and marketing campaigns that use its customers' CPNI, and (2) all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. ITL will retain the record for a minimum of one year.
- ITL has established a supervisory review process regarding its compliance with section 64.2001 *et seq.* of the Commission's rules. 47 C.F.R. § 64.2001 *et seq.* for outbound marketing situations. ITL also maintains records of its compliance for a minimum period of one year. ITL sales and marketing personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.
- ITL has an officer sign and file with the Commission an annual CPNI compliance certificate. The officer states in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with section 64.2001 *et seq.* of the Commission's rules. 47 C.F.R. § 64.2001 *et seq.*
- ITL does not solicit opt-out approval from its customers for use of CPNI. If ITL subsequently chooses to take any action for which the company must solicit the opt-out approval of its customers for the use CPNI, the company will provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly to such a degree that customers' inability to opt-out is more than an anomaly. The notice will be made pursuant to, and in accordance with, section 64.2009(f) of the Commission's rules, 47 C.F.R. § 64.2009(f).

SAFEGUARDS ON THE DISCLOSURE OF CPNI – SECTION 64.2010

- ITL has implemented reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI.
- ITL requires customers to provide a pre-established password prior to releasing call detail information over the phone during a customer-initiated call or online. If a

customer forgets his or her password, ITL authenticates the customer without using readily available biographical information.

- ITL does not disclose CPNI at its office locations.
- ITL notifies customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.
- ITL may establish alternative authentication regimes for business customers that have both a dedicated account representative and a contract that specifically addresses the ITL's protection of CPNI.

NOTIFICATION OF CPNI SECURITY BREACHES – SECTION 64.2011

- ITL will notify law enforcement of a breach of its customers' CPNI as provided in section 64.2011 of the Commission's rules, 47 C.F.R. § 64.2011.
- ITL will not notify its customers or disclose the breach publicly, whether voluntarily or under state or local law or these rules, until the company has completed the process of notifying law enforcement pursuant to paragraph (b) of section 64.2011 of the Commission's rules, 47 C.F.R. § 64.2011(b).
- After ITL has completed the process of notifying law enforcement pursuant to paragraph (b) of section 64.2011 of the Commission's rules, 47 C.F.R. § 64.2011(b), it will notify its customers of a breach of those customers' CPNI.
- ITL will maintain a record of any breaches discovered, notifications made to the USSS and the FBI pursuant to paragraph (b) of section 64.2011 of the Commission's rules, 47 C.F.R. § 64.2011(b), and notifications made to customers. The record will include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. ITL will retain the record for a minimum of 2 years.